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18 **UNITED STATES DISTRICT COURT**

19 **SOUTHERN DISTRICT OF CALIFORNIA**

20 SECURITIES AND EXCHANGE  
21 COMMISSION,

22 Plaintiff,

23 v.

24 LOUIS V. SCHOOLER and FIRST  
FINANCIAL PLANNING  
25 CORPORATION d/b/a WESTERN  
FINANCIAL PLANNING  
26 CORPORATION,

27 Defendants.  
28

Case No. 12 CV 2164 GPC JMA

**JOINT MOTION FOR:**

**1. CONSOLIDATION OF HEARING  
DATES FOR MOTION FOR ASSET  
FREEZE AND MOTION FOR  
PARTIAL SUMMARY JUDGMENT  
2. REQUEST OF ORAL ARGUMENT  
FOR MOTION FOR ASSET FREEZE  
AND MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

1 Plaintiff Securities and Exchange Commission ("Plaintiff") and Defendants  
2 Louis V. Schooler ("Schooler") and First Financial Planning Corporation d/b/a  
3 Western Financial Planning Corporation ("Western")(collectively, "Defendants")  
4 have met and conferred and hereby submit this Joint Motion for Consolidation of  
5 Hearing Dates for Plaintiff's Motion for Partial Summary Judgment (Dkt. No. 685)  
6 and Plaintiff's Motion for Asset Freeze (Dkt. Nos. 862, 864) to be held on March  
7 27, 2015, at 1:30 p.m., to the extent that the Court will hear oral argument.

8 Currently, the Motion for Asset Freeze is scheduled to be heard on March  
9 20, 2015, and the Motion for Partial Summary Judgment is scheduled for hearing  
10 on March 27, 2015. However, the motions are overlapping because the Motion for  
11 Asset Freeze is intended to secure Mr. Schooler's assets in anticipation of  
12 satisfaction of the order of disgorgement and judgment of liability that Plaintiff  
13 seeks in the Motion for Partial Summary Judgment. Therefore, Defendants have  
14 submitted oppositions to both Motions with similar arguments, which in turn has  
15 resulted in the parties moving jointly to allow Plaintiff to file one consolidated  
16 brief of not more than 30 pages by March 6, 2015 to address both oppositions,  
17 which joint motion was granted by this Court. *See* Dkt. Nos. 980, 981, 998.

18 Because of the overlapping nature of the Motion for Asset Freeze and the  
19 Motion for Partial Summary Judgment, consolidating the hearings on both motions  
20 to March 27, 2015, would benefit the Court and all parties.

21 Furthermore, because of the issues at stake in Plaintiff's Motions for Asset  
22 Freeze and Motion for Partial Summary Judgment – a potential adjudication of  
23 liability against Defendants for the offering and/or sale of unregistered securities,  
24 the seeking of disgorgement of over \$152 million plus over \$9 million in pre-  
25 judgment interest, and the total freezing of Mr. Schooler's assets – and the  
26 substantial amount of written briefing and supporting exhibits, oral argument is  
27  
28

1 necessary for addressing particular issues the Court may have that arise from the  
2 written briefing.

3  
4 DATED: March 5, 2015

Respectfully submitted,

5  
6 /s/ Sam S. Puathasnanon

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7  
8  
9  
10 /s/ Philip H. Dyson

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